

From: [Maria Martinez](#)
To: [Christopher Ruhl](#)
Cc: [Eric Delgado](#); [Jon Rauscher](#); [R6 DWH REOC PSC@EPA](#); [R6 DWH Info@epa.gov](#); [Ruben Casso](#); [Susan Webster](#); [Mark Hansen](#); [Chris Petersen](#)
Subject: Update - Re: Ceasing reporting of H2S, LEL, O2, CO
Date: 06/06/2010 07:11 PM

Chris et. al.,

I want to update you on the question for getting a recommendation from the Air Committee to discontinue H2S monitoring.

I have drafted a rough draft of the H2S monitoring cessation memo. I have just sent it to the Air Committee for review and comment this afternoon. I have requested comments by COB Tuesday, June 8th.

I will keep you posted.

Maria

▼ Christopher Ruhl---06/04/2010 04:49:55 PM---Maria- I would like to learn more about this Air Committee and what our interaction is with it for t

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Date: 06/04/2010 04:49 PM
Subject: Re: Ceasing reporting of H2S, LEL, O2, CO

Maria-

I would like to learn more about this Air Committee and what our interaction is with it for the response. As far who you are working with, how can we help you accomplish what you need to and what is the timing for it? I had thought that you had previously indicated that we could stop H2S on 6/8. I wanted EU to put together a justification since that is routine during a response. I still want the EU to continue working on the justification because a necessary to communicate it to the USCG. We can make it available to you and perhaps you will want to use it in the white paper that you are developing.

Chris Ruhl
USEPA Region 6
Federal On-Scene Coordinator
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▼ Maria Martinez---06/04/2010 04:19:20 PM---Chris, I do not recommend ceasing

the H2S monitoring at this time. I understand your rationale but

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Date: 06/04/2010 04:19 PM
Subject: Re: Ceasing reporting of H2S, LEL, O2, CO

Chris,

I do not recommend ceasing the H2S monitoring at this time. I understand your rationale but OAR wants this step to be documented and coordinated through the Air Committee and EOC before ceasing the H2S monitoring.

We have started the issue paper that will lay out our exit strategy but we are not complete with it and it will still need to be vetted and coordinated with OAQPS, OAR and the EOC through the Air Committee.

Once again I understand your technical justification but we need to have this step be a coordinated and vetted process.

Maria
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▼ Christopher Ruhl---06/04/2010 04:03:30 PM---Planning/Environmental Unit I visited with Jon Raucher and Maria Martinez earlier in the week about

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Cc: Maria Martinez/R6/USEPA/US@EPA, Susan Webster/R6/USEPA/US@EPA, Jon Rauscher/R6/USEPA/US@EPA
Date: 06/04/2010 04:03 PM
Subject: Ceasing reporting of H2S, LEL, O2, CO

Planning/Environmental Unit

I visited with Jon Raucher and Maria Martinez earlier in the week about potentially stopping the monitoring for H2S. The primary reason for this is to move to the use of the mini rae systems. The mini rae system allows for constant data transfer which allows us to be more responsive to spikes of VOCs. The mini raes are currently operational and have been so for several days. I would like you review the data available to determine if the cessation of the H2S monitoring is appropriate. If it is we need to develop something that justify such an action. To accomplish this I would like you to look at least the following items at a minimum: discharged oil analysis for the presence

of H₂S, dispersant analysis for the presence of H₂S and the history of data that we have recorded for the presence of H₂S. One key characteristic of H₂S is its odor. In the event that we get an odor complaint consistent with H₂S we will maintain the capability to conduct mobile H₂S monitoring. As well please review the data that we have and determine if we can discontinue the monitoring for O₂, LEL, and CO. All three have exhibited normal reading as we would expect and I believe the data supports the discontinuing of it.

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